

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

Shawn
Garvey
vs.
Interactions
Marketing
Plaintiff(s)
Defendant(s)

Civil Case No.: 5:17-cv-1257
(MAD/TWD)
COMPLAINT PURSUANT
TO THE AMERICANS
WITH DISABILITIES ACT

Plaintiff(s) demand(s) a trial by: ☒ JURY ☐ COURT (Select only one).

Plaintiff(s) in the above-captioned action, allege(s) as follows:

JURISDICTION

- This is a civil action seeking judgment, relief and/or damages brought pursuant to the Americans with Disabilities Act, 42 U.S.C. § 12101 *et seq.*, as amended, for discrimination based upon a disability and the failure to accommodate same. This Court has jurisdiction of this action pursuant to 28 U.S.C. §§ 1331 and 1343(4).

PARTIES

2. a. Plaintiff: Shawn Garvey
Address: P.O. Box 12
Liverpool NY
13090

b. Plaintiff: _____
Address: _____

Additional Plaintiffs may be added on a separate sheet of paper.

3. a. Defendant: Interactions Marketing

Official Position: _____

Address: 9555 Chesapeake Drive
San Diego CA

b. Defendant: Interactions Marketing

Official Position: CIO Kim Colburn

Address: 333 Ludlow St
4th floor
Stamford, CT 06902

Additional Defendants may be added on a separate sheet of paper.

4. My disability is as follows:

- Anxiety Panic
- Documents from
human rights campaign
~~attached~~ attached
and along with abridged
at this point.

5. The conduct complained of in this action involves:
(Check all that apply)

- (A) ☐ Failure to employ.
(B) ☒ Termination of employment.
(C) ☐ Denial of participation in public service or program.
(D) ☐ Failure to make alterations to accommodate disability.
(E) ☐ Retaliation.
(G) ☒ Other acts as specified below:

6.

FACTS

On the following page, set forth the facts of your case which substantiate your claim of discrimination. List the events in the order they happened, naming defendants involved, dates and places.

Note: Each fact should be stated in a separate paragraph; paragraphs should be numbered sequentially.

You must include allegations of wrongful conduct as to EACH and EVERY defendant in your complaint.

You may use additional sheets as necessary.

- Alleged poor performance
- Alleged sexual misconduct on my part lack investigation.
- No accommodations
or interest in figuring out how to assist me.

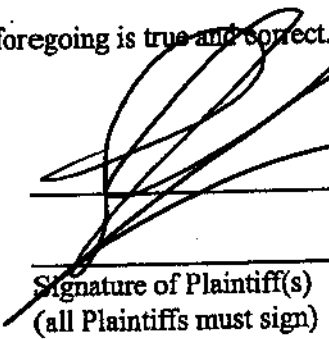
7. PRAYER FOR RELIEF

WHEREFORE, plaintiff(s) request(s) that this Court grant the following relief:

Due to the
conduct which I
will illustrate for you
I request \$5,000,000.00
This is no joke, nor
is this frivolous. I will provide

I declare under penalty of perjury that the foregoing is true and correct.

DATED: 11/15/17



Signature of Plaintiff(s)
(all Plaintiffs must sign)

Document and reasoning
for this
Figure

SECOND CAUSE OF ACTION

Due to my disorder I
had to go to hospital which
caused further complications
with the job the eventually
caused termination.

THIRD CAUSE OF ACTION

I was also alleged
sexual misconduct that
I endured like due
to having being let go
along with the anxiety disorder.

10. I filed charges with the New York State Division on Human Rights, the New York City Commission on Human Rights or Equal Employment Opportunity Commission regarding the alleged discriminatory acts on or about:

Nov 16, 2016

(Provide Date)

11. The Equal Employment Opportunity Commission issued a Notice-of-Right-to-Sue letter (copy attached) which was received by me on or about:

Aug 17 2017

(Provide Date)

12. The plaintiff is an employee within the meaning of 42 U.S.C. § 2000e(f).
13. The defendant(s) is (are) an employer, employment agency, or labor organization within the meaning of 42 U.S.C. § 2000e(b), (c), or (d).
14. The defendant(s) is (are) engaged in commerce within the meaning of 42 U.S.C. § 2000e(g).

8.

FACTS

Set forth the facts of your case which substantiate your claims. List the events in the order they happened, naming defendants involved, dates and places.

Note: You must include allegations of wrongful conduct as to EACH and EVERY defendant in your complaint. (You may use additional sheets as necessary).

- I was wrongfully terminated
due to a disability, that
was shown probable cause
by the human rights
campaign. I was alleged
misconduct on the side of
poor performance, etc. yet
was let go for situations
due to an anxiety disorder.

9.

CAUSES OF ACTION

Note: You must clearly state each cause of action you assert in this lawsuit.

FIRST CAUSE OF ACTION

I was let go due to
anxiety disorder. My
employer failed to assist
me in any accommodations
during my employment.

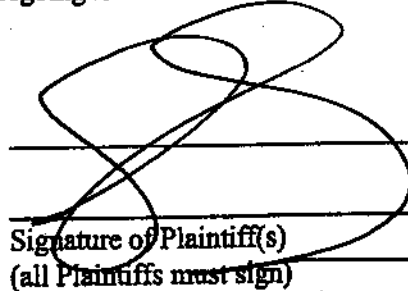
15. PRAYER FOR RELIEF

WHEREFORE, plaintiff(s) request(s) that this Court grant the following relief:

I seek Damages at this
time of ~~400~~ \$ 500,000.00
I will coinide exactly where I
came from this number.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: 11/14/17

 11/14/17

Signature of Plaintiff(s)
(all Plaintiffs must sign)